REMARKS

In the Office Action,[1] the Examiner rejected claims 1, 3-8, 10, 12-14, 16, 18-20,

22, 24, 25, 28, and 29 under 35 U.S.C. §101 as being directed to non-statutory subject

matter; and rejected claims 1, 3-8, 10, 12-14, 16, 18-20, 22, 24, 25, 28, and 29 under

35 U.S.C. §103(a) as being unpatentable over U.S. Publication No. 2003/0004874 to

Ludwig et al. ("*Ludwig*") in view of U.S. Patent No. 6,578,015 to Haseltine et al.

("*Haseltine*").

Applicants thank the Examiner for conducting a telephonic interview on

September 6, 2007. Although no agreement was reached, the pending claims and

applied prior art were discussed. By this Amendment, Applicants amend claims 1, 6, 8,

14, 20, and 28; and cancel claim 4. Claims 1, 3, 5-8, 10, 12-14, 16, 18-20, 22, 24, 25,

28, and 29 remain pending.

I.   Rejection of Claims 1, 3-8, 10, 12-14, 16, 18-20, 22, 24, 25, 28, and 29 under 35 U.S.C. § 101

Applicants respectfully traverse the rejection of claims 1, 3-8, 10, 12-14, 16,

18-20, 22, 24, 25, 28, and 29 under 35 U.S.C. § 101. However, to advance

prosecution, Applicants have amended independent claims 1, 8, 14, and 20 to recite (or

similarly recite) "displaying the workflow on a display to the user," as suggested by the

Examiner during the interview. Accordingly, Applicants respectfully request the

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[1] The Office Action contains a number of statements reflecting characterizations of the related art and the claims. Regardless of whether any such statement is identified herein, Applicants decline to automatically subscribe to any statement or characterization in the Office Action.

Examiner to reconsider and withdraw the rejection of claims 1, 3-8, 10, 12-14, 16, 18-20, 22, 24, 25, 28, and 29 under 35 U.S.C. § 101.

II. Rejection of Claims 1, 3-8, 10, 12-14, 16, 18-20, 22, 24, 25, 28, and 29 under 35 U.S.C. § 103(a)

Applicants respectfully traverse the rejection of claims 1, 3-8, 10, 12-14, 16, 18-20, 22, 24, 25, 28, and 29 under 35 U.S.C. § 103(a) as being unpatentable over *Ludwig* in view of *Haseltine*, because a *prima facie* case of obviousness has not been established.

To establish a *prima facie* case of obviousness, the prior art (taken separately or in combination) must teach or suggest all the claim limitations. *See* M.P.E.P. § 2142, 8th Ed., Rev. 5 (August 2006). Moreover, "in formulating a rejection under 35 U.S.C. § 103(a) based upon a combination of prior art elements, it remains necessary to identify the reason why a person of ordinary skill in the art would have combined the prior art elements in the manner claimed." USPTO Memorandum from Margaret A. Focarino, Deputy Commissioner for Patent Operations, May 3, 2007, page 2.

A *prima facie* case of obviousness has not been established because, among other things, the prior art, taken alone or in any proper combination, fails to teach or suggest each and every element of Applicant's claims.

Independent claim 1, as amended, recites a combination including, for example, "the state value table further comprises an instruction which depends on the current state and is automatically executable by a computer."

In the Office Action, the Examiner alleges that "Close 608" of *Ludwig*, in para. 0090, discloses the "instruction" of claim 1. *See* Office Action, p. 9 (comments on claim 4). The Examiner's allegation is incorrect.

Ludwig discloses "'Close' 608 may cause the system to mark as closed all invoices that are selected." *Ludwig*, para. 0090; *see also* Fig. 6a, item 608. *Ludwig* further discloses elements of "Next", "Previous", "All", "Back", "Search", "Show Selected", "Paid Through Another Source", "View," and "Export." *Ludwig*, paras. 0084-0089 and 0091; Fig. 6a, items 605 and 632. However, none of these elements disclose or suggest "an instruction which depend on the current state," as recited in claim 1 (emphasis added).

For example, in an embodiment consistent with the claimed invention, in "table 205, one or more instructions . . . are assigned to a state." Specification, p. 12, line 6.[2] As illustrated in Applicants' Fig. 2, table 205 includes instructions (e.g., "Start workflow 1" and "Call Procedure 3") which depend on a state (e.g., "S2"). Nothing in *Ludwig* discloses that "Close", "Next", "Previous", "All", "Back", "Search", "Show Selected", "Paid Through Another Source", "View," or "Export" "depends on the current state," as recited in claim 1.

In addition, *Ludwig* fails to disclose "an instruction which . . . is automatically executable by a computer," as recited in claim 1. In *Ludwig*, "[t]he system may permit

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[2] In making the various references to the specification, it is to be understood that Applicants are in no way intending to limit the scope of the claims to the exemplary embodiments described in the specification. Rather, Applicants expressly affirm that they are entitled to have the claims interpreted broadly, to the maximum extent permitted by statute, regulation, and applicable case law.

the . . . user to select a[] [Close] option 608 to retrieve all closed invoices" (para. 0096),

"[t]he system may permit a . . . user to select a[] [Close] option 605 . . . [and]

[d]epending on the selection, the system may direct the user to a 'view options' page

606" (para. 0080), and when "'Close' 608 . . . [is] selected[] [t]he system may display to

the user a confirmation message before the invoices are closed" (para. 0090). Since

Ludwig discloses a user selection and user confirmation, *Ludwig* cannot teach or

suggest "an instructions which . . . is automatically executable by a computer," as

recited in claim 1.

Regardless of whether the Examiner's characterization of *Haseltine* is correct,

Haseltine fails to cure the above-discussed deficiencies of *Ludwig* because *Haseltine*

also fails to disclose or suggest at least that "the state value table further comprises an

instruction which depends on the current state and is automatically executable by a

computer," as recited in claim 1.

For at least the reasons stated above, the prior art, taken alone or in a proper

combination, fails establish a *prima facie* case of obviousness with respect to claim 1.

Independent claims 8, 14, and 20, although different in scope from claim 1, are

allowable over the prior art for at least reasons similar to those stated above for claim 1.

Dependent claims 3, 5-7, 10, 12, 13, 16, 18, 19, 22, 24, 25, 28, and 29 are allowable

over the prior art at least by virtue of their dependence from allowable base claims 1, 8,

14, and 20. Claim 4 has been canceled, rendering the rejection thereof moot.

Accordingly, Applicants respectfully request the Examiner to reconsider and withdraw

the rejection of claims 1, 3-8, 10, 12-14, 16, 18-20, 22, 24, 25, 28, and 29 under

35 U.S.C. § 103(a).

CONCLUSION

In view of the foregoing, Applicants respectfully request reconsideration of this

application and the timely allowance of the pending claims.

Please grant any extensions of time required to enter this response and charge

any additional required fees to our deposit account 06-0916.

Respectfully submitted,

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Dated: September 27, 2007   By:_____

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